

Oct. 12, 2017

Chairman Ajit Pai  
Commissioner Mignon Clyburn  
Commissioner Michael O’Rielly  
Commissioner Brendan Carr  
Commissioner Jessica Rosenworcel  
c/o Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Pai, Commissioner Clyburn, Commissioner O’Rielly, Commissioner Carr, Commissioner Rosenworcel, and Ms. Dortch,

On behalf of Cal Performances, located at the University of California at Berkeley, that provides approximately 160 performances per year to 350,000 audience members and 135 education programs to 35,000 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

*Cal Performances’ Mission*

*To produce and present performances of the highest artistic quality, enhanced by programs that explore compelling intersections of education and the performing arts.*

We strongly support the Commission’s proposal to expand Part 74 license eligibility to include persons and organizations that can demonstrate the need for professional, high-quality audio and have the capability of providing it through conscientious use of wireless microphones. We support and endorse the Comments filed in these dockets by The Performing Arts Wireless Microphone Working Group.

Professional performing arts organizations hold thousands of performances each year, and wireless microphones are essential to producing high-quality performances while mitigating significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to our sector.

Cal Performances owns and uses between four and twenty wireless microphones, in-ear communications (IFBs), cue and control devices, and equipment controlling devices per presentation or performance most days of the year. Most of our equipment operates within the low UHF bands and is frequency selectable within a range of 60.000 MHz. Cal Performances own some analog and some digital equipment. The life expectancy of most of the equipment in question is approximately 8 years. When the 700MHz band became obsolete, we were forced to spend thousands of dollars on new equipment.

As the audio Department Head, I have taken classes from both Sennheiser and Shure, the two leading manufacturers of our wireless equipment, and I have utilized wireless audio gear for the past 30+ years in professional performance and broadcast.

I would urge the Commission to grant a Part 74 license if an applicant can provide certification of:

- A mission statement of providing performing arts to the public;
- A history of professional-quality wireless audio presentations to audiences without interference;
- Technical guidance and frequency coordination by qualified professionals (active in audio engineering who have academic degrees or equivalent professional experience and who are familiar with radio-frequency coordination);
- A commitment to register for protection only the frequencies, times, and locations actually needed; and
- A practice of keeping logs of all wireless microphone uses, including frequencies, for all performances.

Performing arts organizations provide demonstrable service to the public in improving quality of life; preserving our cultural heritage; and providing education, enlightenment, and entertainment. They also contribute to local economies in every community across this country. I respectfully endorse the Commission's proposal to expand Part 74 LPAS rules to accommodate performing arts organizations and educational institutions that use fewer than 50 wireless microphones. The proposal is a much-needed solution that benefits the arts community and the public as well as the many new and emerging unlicensed white space technologies.

Sincerely,

Thomas Craft  
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